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Of Attorneys for Defendants
Alireza Zamanizadeh, a/k/a Ali
Zamani and Adult Care Search

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

ANGELA TORRES, an individual,

Case No. 3:17-cv-01270-AC

Plaintiff,

**DECLARATION OF TIMOTHY J.
CALDERBANK**

V.

ALIREZA ZAMANIZADEH, a/k/a ALI ZAMANI, an individual, and ADULT CARE SEARCH, a foreign non-profit corporation,

Defendants.

I, Timothy J. Calderbank, hereby state and declare as follows:

1. My name is Timothy J. Calderbank. I am over the age of 18 and am otherwise competent to be a witness in this proceeding. I make this declaration based upon my personal knowledge except as otherwise set forth.

2 I am the attorney for the Defendants in this action

3. Court preliminarily ordered all assets and monies frozen from the bank accounts of Defendants.

4. Only court-authorized payments, including legal fees, can be made with no guarantee the firm would ever be paid.

1 5. Attorney has lost faith in clients' ability to cooperate meaningfully;
2 6. Attorney may become a fact witness;
3 7. Client refusing to following attorney's advice;
4 8. The attorney has a conflict of interest or cannot otherwise continue
5 representing defendants without violating the rules of professional conduct.

6 **I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF**
7 **THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND**
8 **CORRECT.**

9 DATED: January 25, 2018

10 AT: Vancouver, Washington.

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12 LANDERHOLM, P.S.

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14 */s/ Timothy J. Calderbank*
15 TIMOTHY J. CALDERBANK, OSB #45682
16 Of Attorneys for Defendants

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CERTIFICATE OF SERVICE

2 I certify that I electronically filed the foregoing **DECLARATION OF**
3 **TIMOTHY J. CALDERBANK** with the Clerk of the Court for the United States
4 District Court, District of Oregon, by using the CM/ECF system on 25th day of January,
5 2018, namely to:

David W. Richardson
PDX Law Group, P.C.
121 SW Morrison St, Suite 1520
Portland, OR 97204

VIA CERTIFIED MAIL / RETURN RECEIPT REQUESTED

10 Alireza Zamanizadeh
Adult Care Search, Inc.
613 SW Elderbrook Place
11 Portland, OR 97225

Signed at Vancouver, Washington this 25th day of January, 2018.

/s/ Timothy J. Calderbank
TIMOTHY J. CALDERBANK, OSB #45682